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IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

Jesus Victor Rodriguez, pro se Plaintiff, vs, CAVALRY PORTFOLIO SERVICES, LLC., Defendant	No. 11CV1837 LAB MDD VERIFIED COMPLAINT JURY TRIAL DEMANDED
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PRELIMINARY STATEMENT

1. This is an action for damages brought from violations of the Fair Credit Reporting Act (FCRA) 15 U.S.C. §1681 *et seq.*

JURISDICTION AND VENUE

2. The jurisdiction of this Court is conferred by 15 U.S.C. §1681b.
3. Plaintiff, Jesus Victor Rodriguez is a natural person and is a resident of the State of California.
4. Defendant, CAVALRY PORTFOLIO SERVICES, LLC (CAVALRY PORTFOLIO SERVICES, LLC"), is a Delaware Corporation, and assumed authorized to do business in California.
5. All conditions precedent to the bringing of this action have been performed, waived or excused.

VERIFIED COMPLAINT

FACTUAL ALLEGATIONS

6. On November 16, 2010, Defendant initiated a hard pull of Plaintiff's credit report from Experian without permissible purpose.

COUNT ONE

VIOLATION OF FAIR CREDIT REPORTING ACT (FCRA), 15 U.S.C. §1681, WILLFUL NON-COMPLIANCE BY DEFENDANT CAVALRY PORTFOLIO SERVICES, LLC.

7. Paragraphs 1 through 6 are re-alleged as though fully set forth herein.
8. Plaintiff is a consumer within the meaning of the FCRA, 15 U.S.C. §1681a(c).
9. CAVALRY PORTFOLIO SERVICES, LLC. is a furnisher of information within the meaning of the FCRA, 15 U.S.C. §1681s-2.
10. CAVALRY PORTFOLIO SERVICES, LLC. willfully violated the FCRA. Defendant's violations include, but are not limited to, the following:
- (a) CAVALRY PORTFOLIO SERVICES, LLC. willfully violated 15 U.S.C. §1681b(f) by obtaining Plaintiff's consumer report without a permissible purpose as defined by 15 U.S.C. §1681b.

WHEREFORE, Plaintiff demands judgment for damages in the amount of \$1,000 against CAVALRY PORTFOLIO SERVICES, LLC. for actual or statutory damages, and punitive damages, attorney's fees and costs, pursuant to 15 U.S.C. §1681n.

DEMAND FOR JURY TRIAL

Plaintiff hereby demands a trial by jury of all issues so triable as a matter of law.

VERIFICATION

I, **Jesus Victor Rodriguez**, living soul and Authorized Agent for **JESUS VICTOR RODRIGUEZ**, have read the foregoing and know the contents thereof. The same is true based on my own experience and knowledge, except as to those matters which are therein upon information and belief, and as to those claims or facts, I believe them to be true. I assert under the penalty of perjury of the laws of the united States of America and the laws of California that the foregoing is true and correct.

Without Recourse,
All Rights Retained Without Prejudice.
Respectfully submitted,

By: Jesus Victor Rodriguez
Jesus Victor Rodriguez, Plaintiff